Certification Of CPNI Filing as of February 3, 2006

**Certifying That** 

**Citizens Telephone Cooperative** 

Is Compliant With FCC Rules To Safeguard

**Customer Proprietary Network Information** 

Docket EB-06-TC-060 and EB Docket No. 06-36

STATE OF VIRGINIA

COUNTY OF FLOYD

I, Gerald W. Gallimore declare as follows:

1. I am employed by Citizens Telephone Cooperative as its Chief Executive Officer. I am

an officer of Citizens Telephone Cooperative and am authorized to give this certification on its behalf.

This certificate is being given to comply with FCC Rules §64.2009 (e).

2. In compliance with 47 C.F.R. § 64.2001 - § 64.2009, every telecommunications carrier is

required to protect from unauthorized disclosure any Customer Proprietary Network Information (CPNI)

as defined in Section 222 of the Communications Act of 1934 as amended. Further, every

telecommunications carrier is required to have defined procedures in place to protect said information.

3. Citizens Telephone Cooperative hereby certifies that it has procedures in place to comply

with the applicable rules.

February 3, 2006

Date

Gerald W. Gallimore

Chief Executive Officer

Citizens Telephone Cooperative

P. O. Box 137

Floyd, Virginia 24091

## STATEMENT OF OPERATIONS OF CITIZENS TELEPHONE COOPERATIVE TO ENSURE PROTECTION OF CPNI

Citizens Telephone Cooperative, **the company**, has implemented the following safeguards to protect Customer Proprietary Network Information (CPNI) in compliance with FCC rules §64.2001 - §64.2009.

Through its employee training, the company ensures that all employees are aware of the privacy of communications requirements incumbent on them.

Employees are only able to access records required by them in the performance of the assigned duties.

Employees engaged in marketing and sales activities are only allowed to use CPNI as it relates to customer services currently provided by the company to the customer.

The company requires its vendors, suppliers, and service bureaus to certify that CPNI of the company entrusted to them will not be disclosed in violation of the FCC Rules.